

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: :
: **Case No.: 20-14237**
Jerome R Armstrong : **Chapter 13**
: **Judge Derek J. Baker**
Debtor(s). : * * * * *

Jerome R Armstrong, John T Paugh, Jr, :
Amanda I. Armstrong, Kenneth E. West : **Related to Document No. 49**
Movant :
v. :
:
Wells Fargo Bank, N.A. :
Respondent :
:

RESPONSE TO MOTION TO APPROVE SALE OF REAL PROPERTY (DOCKET # 49)

Now comes Wells Fargo Bank, N.A. ("Creditor") by and through its attorneys, MDK Legal, and responds to the Motion to Approve Sale of Real Property filed by Jerome R Armstrong ("Debtor") on April 8, 2025 at Docket # 49. Creditor does not oppose the Motion so long as Creditor's lien is paid in full and that any short sale will be contingent on written approval from Creditor. Creditor requests that Debtor's counsel request a payoff quote from Creditor to ensure the lien is paid in full prior to closing. Creditor anticipates this response can be resolved with an agreed order.

WHEREFORE, Creditor respectfully requests that the Court grant Creditor with the relief this Court deems just and proper.

Respectfully submitted,

/s/Stephen R. Franks
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Attorneys for Creditor

The case attorney for this file is Stephen R. Franks.

Contact email is srfranks@mdklegal.com

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CERTIFICATE OF SERVICE

I certify that on the date of filing, a copy of the foregoing Motion to Approve Sale of Real Property was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

Kenneth E. West, Chapter 13 Trustee, ecfemails@ph13trustee.com

I certify that on the date of filing, a copy of the foregoing document was sent by U.S. Mail to the following:

Jerome R Armstrong, John T Paugh, Jr, and Amanda I. Armstrong, 348 Britt Road, North Wales, PA 19454

/s/Stephen R. Franks